

1 Paul A. Murray
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3 Spokane WA 99223
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5 *pro per representative*

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JAN 12 2022

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF WASHINGTON

8 UNITED STATES OF AMERICA,
9

10 Plaintiff,

11 v.
12

13 PAUL AARON MURRAY,
14

15 Defendant.
16
17
18

No. 2:18-cr-0053-TOR

**DEFENDANT'S MOTION FOR
RECORDS SUBPOENAS AND
EXPEDITED HEARING**

**January 19, 2022 @ 6:30 p.m.
Without Oral Argument**

19 COMES NOW the Defendant Paul A. Murray, *pro persona*, and moves
20 the Court on an expedited basis for an order pursuant to Federal Rule of
21 Criminal Procedure 17(c) for the issuance of Records Subpoenas.
22

23 Ct. Order ECF No. 133 "ORDER as to Paul Aaron Murray (1): The
24 Defendants Motion for Records Subpoenas, ECF No. 114, is GRANTED. In
25 accordance with the Courts direction to counsel at the hearing on motions and
26 Fed. R. Crim. P. 17(c), the Defendant shall issue and serve the subject
27 subpoenas for early production of records only, not personal appearances. As
28
29
30
31
32

1 soon as the records are received by the Defense, a copy shall be provided to
2 the United States.”
3

4 Above Court Ordered records request was not executed by prior Counsel,
5 this motion simply updates the records request and ensures that the records
6 request is succinct, to the point, not overly broad for this ESI data request
7
8 from two highly reputable IT companies.
9
10

11 This Records requests, as per *Ct. Order* ECF No. 133, includes
12

13 1. Dropbox account “paul@gayleterry.com”
14

- 15 a. Please provide the record of last connection date, time, and
16 associated IP address for devices “UDI_1” laptop and “Paul
17 A. Murray” iPhone associated with Dropbox account
18 paul@gayleterry.com
19
20
21

22 2. Apple ID “paul@gayleterry.com”
23


- 24 a. Please provide the records of app and analytics data
25 associated with the IP address of 24.116.111.145 for this
26 Apple account.
27
28

29 Proposed Orders (AO 89B (07/16) have been provided.
30

31 These records request is key for the Defense, and should have been
32 properly served, responded to, and provided to all Parties years ago. The

1 Defense requires for hearings, trials, and for supplementing Rule 16
2 disclosures (Jan. 24, 2022). The data records have long since expired,
3
4 evaporated (*see* ECF No. 165 at 7, ECF No. 188 at 9) from Defendant's
5
6 personal data request or access. Most online companies will not retain records
7
8 (personal access logs) more than six months, let alone four years. The records
9
10 request above is no longer available from personal data requests, the records
11
12 may only be obtained through this formal records request to the companies
13 themselves.

14
15 RESPECTFULLY SUBMITTED this 12 day of January 2022 in Spokane,
16
17 Washington.


18
19
20 By: 
21 Paul A. Murray
22 pro per representative

23
24 Paul A. Murray
25 Case No. 2:18-cr-0053-TOR
26 3029 E 19th Ave
27 Spokane, WA 99223
28 (509) 818-2905
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32

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court in Person on 12 day of January 2022, while a copy of this filing was hand delivered to the Office of AUSA Spokane WA c/o the attorneys who have appeared in this matter including Prosecutors Ann Wick and Alison Gregoire.

DATED this 12 day of January 2022 in Spokane, Washington.

By: 
Paul A. Murray
Pro per representative

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